

FILED

October 4, 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

By: JG

Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY FARISS PIEPER,

Defendant.

Case No: EP:23-CR-01926-KC

INDICTMENT

**CT 1: 18 U.S.C. § 2422(b) -
Attempted Coercion and Enticement;**

***Notice of Government's Demand for
Forfeiture***

THE GRAND JURY CHARGES:

COUNT ONE

**(Attempted Coercion and Enticement)
(18 U.S.C. § 2422(b))**

Beginning on or about September 8, 2023, and continuing through and including on or about September 9, 2023, in the Western District of Texas and elsewhere, the Defendant,

BRADLEY FARISS PIEPER,

did use any facility of interstate and foreign commerce, to knowingly attempt to persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense that is, Indecency with a Child, in violation of Texas Penal Code Section 21.11, and all in violation of Title 18, United States Code, Section 2422(b).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Coercion and Enticement Violation and Forfeiture Statutes

**[Title 18 U.S.C. § 2422(b), subject to forfeiture pursuant to
Title 18 U.S.C. §§ 2428(a)(1) and (2)]**

As a result of the foregoing criminal violation set forth in Count One, the United States of America gives notice to Defendant **BRADLEY FARISS PIEPER** of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2, Title 18 U.S.C. §§ 2428(a)(1) and (2), which state:

Title 18 U.S.C. § 2428. Criminal forfeiture

(a) In general.— The court, in imposing sentence on any person convicted of a violation of this chapter, shall order, in addition to any other sentence imposed and irrespective of any provision of State Law, that such person shall forfeiture to the United States-

- (1) such person's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
- (2) any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

This Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraph II.

II.
Property

1. Samsung cellular device bearing IMEI: 351132610249761; and
2. Any and all other property and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: Debra D. Kary
Assistant United States Attorney